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February 18, 2000

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Commission's Secretary  
Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
Room TW-B204  
445 - 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Comments for FCC 99-414, WT Docket No. 99-366, RM-8267  
Re: Amendment of Part 95 for the use of Personal Locator Beacons (PLB)

Dear Ms. Magalie Salas,

We applaud this action that the FCC is overseeing as a bold step to saving lives in our remote areas while saving the America tax payer thousands of dollars in wasted search and rescue efforts. This ruling will allow for the timely location and alert of real distresses while providing a positive tool to search and rescue to eliminate false alarms.

The use of registered 406 PLBs will reduce the response costs associated with false and accidental activations. Further it will allow for faster and more cost effective rescues in a actual distress. Instead of teams of people searching vast areas, sometimes not even remotely close to when the victim actually is located, searches will be done to a satellite located position and search areas will be reduced from 100's of square miles to a square mile or less.

Programs will be developed that will rent beacons for special expeditions. The cost of these devices remaining high for the average "back woodsman". There will be a market for serious explorers who devote much of their time in remote areas of the US and Canada. These are the people who spend considerable time afield, whether snowshoeing or skiing, snowmobiling or 4 wheeling, hunting or fishing, boating in everything from kayaks and canoes to luxury cruisers, to school and church groups, as well as mountain climbers. Until now these people have had to us unregistered ELTs or Personal style B EPIRBs. Now they will have an identifiable ID number.

Further, the PLB acts as a "passive" signal allowing people in need of rescue to concentrate on doing other things to save their lives once the PLB is activated. Only PLBs offer a position calculated by satellites and do not rely on the estimated position given by the victim in stress or by relatives of the victim who have no first hand knowledge of their exact location. Search and Rescue is already trained and already has the equipment on hand to further pinpoint the position by using the existing 121.5 homing devices.

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While the licensing will fall under 47 C.F.R. part 95, Personal radio Service Rules, in fact the response will be a better informed Maritime and Land based Search and Rescue effort than that which currently exists. PLBs will be carried as personal equipment aboard vessels, on immersion suits and packed into liferafts which will enhance the information that USCG responders will have prior to and during the rescue.

Further, whether State Police, County Sheriff, the Civil Air patrol, or volunteer organizations (ie Mountain rescue) are responsible for a particular land area, the search area will be reduced and immediate alerts will save thousands of dollars annually for each State in even verifying if someone is indeed missing.

We support the ICSAR recommendation that the existing land-based distress alerts continued to be handled under current procedures that are different but tailored for each states particular needs and conditions.

8.(a) The use of PLBs will enhance the effectiveness of the individual States by giving them specific location and contact information prior to using their resources.

8.(b) Washington, Idaho and Oregon as well as Hawaii have all looked at the Alaska program and have PLB committee's. They know that these devices will not only save lives, but will enhance their States ability to respond quickly and efficiently. Much time was lost and poor feelings generated by the FAA claim to 121.5 MHz and the potential loss of that to Search and Rescue as a homing frequency. This wasted everybody's time and stopped development of a program that should have been implemented years ago.

8. (c) Once available in one State, they will be used everywhere. We are already seeing customers drive to Canada to purchase Canadian Approved PLB units with the full intention of using them in the US should they have a life threatening emergency in a remote area.

8(d) These beacons will become part of a nation wide alerting tool once available anywhere. As we have seen here in the Northwest, people will drive to Canada to purchase these for use on trips to the Caribbean. Whether State controlled or other, this is a national and international program.

9. Frequent updating of the registration information is mandatory; otherwise it becomes a glorified personal B system. Out of date information being as useless as no information. Search and Rescue would simply have the alert and the location without any specific information about the person or party who activated the beacon. It would also increase response time by not having a current contact number to confirm a false alarm. We recommend an update every two years as is currently required for EPIRBs.

  
Charles C. Bond